



California Regional Water Quality Control Board

Santa Ana Region



Alan C. Lloyd Ph.D.
Agency Secretary

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Arnold Schwarzenegger
Governor

November 16, 2005

Mr. Darren Newton
BRAC Environmental Coordinator
Marine Corps Air Station El Toro
Base Realignment and Closure
7040 Trabuco Road
Irvine, CA 92618

COMMENTS ON DRAFT 2004 ANNUAL SYSTEM PERFORMANCE REPORT, PETROLEUM CORRECTIVE ACTION PLAN (PCAP) GROUNDWATER EXTRACTION/TREATMENT SYSTEM, UST SITE 222, FORMER MARINE CORPS AIR STATION, TUSTIN

Dear Mr. Newton:

We have completed our review of the above-referenced document, dated July 29, 2005, which we received on August 1, 2005.

We concur with the report's conclusions that the "MTBE plume downgradient from extraction well 222EW09 was not captured by the pumping activities and has continued to migrate." The extraction wells for the IRP-13S plume have also failed to capture the MTBE plume in the second groundwater-bearing zone. We disagree with your plan to wait until March 2006 to start the investigation. The downgradient edge of the plume is not being controlled by the extraction wells of either of the two groundwater extraction and treatment systems, and the contaminant plume appears to be migrating toward the edge of the Navy's property.

As was discussed with your staff on October 21 and November 4, 2005, we request that the Navy investigate, determine the extent of the MTBE plume and install additional monitoring and extraction wells to characterize and control the plume. We request the submittal of a work plan for groundwater investigation and an aggressive schedule for installation of the necessary monitoring and extraction wells.

If you should have any questions, please call me at (951) 782-4498 or send e-mail to phannon@waterboards.ca.gov.

Sincerely,
Original signed by

Patricia A. Hannon
SLIC/DoD Section

cc: Mr. (Ram) Anantaraman Peddada, Dept. of Toxic Substances Control
Mr. Marc P. Smits, Southwest Division, Naval Facilities Engineering Command
Mr. James Ricks, U. S. EPA, Region IX

California Environmental Protection Agency